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1 Firpo Wycoff Carr
 2 info@firpocarr.com
 3 4067 Hardwick Street, #330
 4 Lakewood, California 90712
 5 (513) 764-6224
 6 Plaintiff in Pro Per

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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
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BY **rsm**

**United States District Court
 Central District of California**

2:23-CV-01813-ODW-MAAx

7 FIRPO WYCOFF CARR,)
 8 Plaintiff)
 9 vs)
 10)
 11 FEDERAL BUREAU OF INVESTI-)
 12 GATION; AND UNITED STATES)
 13 DEPARTMENT OF JUSTICE)
 14 Defendant)

Case No.: _____

COMPLAINT FOR DAMAGES
 PURSUANT TO 10 U.S. Code § 921;
 Title 18, U.S.C., Section 241;
 18 U.S. Code § 2261A

DEMAND FOR JURY TRIAL

I. Jurisdiction

1. This court has jurisdiction under 28 U.S.C. § 1331. Federal question
 jurisdiction arises pursuant to 10 U.S. Code § 921; Title 18, U.S.C., Section 241;
 18 U.S. Code § 2261A.

II. Venue

2. Venue is proper pursuant to 28 U.S.C. § 1391 because the events giving
 rise to this complaint happened in this district.

III. Parties

3. Plaintiff Firpo Wycoff Carr, 4067 Hardwick Street, #330, Lakewood,
 California 90712.

1 4. Defendant Federal Bureau of Investigation, Los Angeles Field Office,
2 11000 Wilshire Boulevard, Suite 1700, Los Angeles, California 90024.

3 5. Defendant U.S. Department of Justice, 950 Pennsylvania Avenue NW,
4 Washington, DC 20530; Central District of California, 312 North Spring Street,
5 Los Angeles, California 90012.
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7 **IV. Statement of Facts**
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9 6. On November 26, 2022, between 6:00 and 6:30 p.m., an undercover
10 Special Agent from the Federal Bureau of Investigation (FBI), Los Angeles Field
11 Office, working under the auspices of a Foreign Intelligence Surveillance Act of
12 1978 (FISA) warrant of which Plaintiff (a law-abiding African American male, age
13 68 with no criminal record), who is suspected of being a spy for a foreign
14 government, is the subject, posed as a person experiencing homelessness and,
15 exceeding his authority, stole the following items from Plaintiff when Plaintiff
16 momentarily stepped away from the table he sat at while dining at Panera Bread
17 restaurant, 11300 South Street, Cerritos, California 90703: one laptop computer, a
18 Microsoft Surface Pro4, a Samsung A32-5G android phone (number ending in
19 8440), a Samsung Tab A computer tablet, a set of HyperX headphones, and a beige
20 satchel. Ultimately, the Special Agent worked with others, including, quite
21 probably, the manager on duty at the time. FBI Cyber Operations teams have
22 tracked Plaintiff's online activity and have interfered or otherwise tampered with
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1 and intercepted Plaintiff's innocuous email transactions for years, wherever he
2 goes, including his job at the University of Phoenix, Southern California Campus,
3 Ontario Learning Center on Wednesday, March 1, 2023, where Plaintiff detected
4 and took a cell phone photo of their WIFI network, "FBI Cyber Ops Tm6⁷." [See
5 Exhibit 1.]
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7 7. Plaintiff is well qualified to recognize aspects of the FBI's covert *illegal*
8 operations attributable to the fact that he attended two weeks (80 hours) of
9 intensive training in the Los Angeles Police Department (LAPD) Detective School
10 (March 13, 2000 – March 24, 2000) where he learned *legal* tactics used by the FBI,
11 as well as courses in Terrorism Awareness. Plaintiff's further familiarity with FBI
12 tactics is evidenced by his training and certification on the California Law
13 Enforcement Telecommunications System (CLETS), a computer network
14 primarily maintained by the FBI that gives police departments access to national
15 databases. Also, Plaintiff's computer training includes being trained and certified
16 on the FBI's National Crime Information Center (NCIC) computerized database.
17 The FBI's website reads regarding this center: "NCIC has operated under a shared
18 management concept between the Federal Bureau of Investigation (FBI) and state
19 and federal criminal justice users since its inception. The FBI provides a host-
20 computer and telecommunication network to the control terminal agency in each of
21 the 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam,
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1 and Canada, as well as federal criminal justice agencies.” (FBI — The FBI’s
2 National Crime Information Center). Furthermore, Plaintiff attended mandatory
3 training to become familiar with the FBI’s Criminal Justice Information Services
4 (CJIS). Their website reads: “The FBI’s Criminal Justice Information Services
5 Division, or CJIS, is a high-tech hub in the hills of West Virginia that provides a
6 range of state of-the-art tools and services to law enforcement, national security
7 and intelligence community partners, and the general public.” (Criminal Justice
8 Information Services (CJIS) — FBI). With his cumulative knowledge and
9 experience, Plaintiff knows that the FBI is intent on using its sophisticated cyber
10 operations to harass and intimidate him.
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14 8. At about 6:00 p.m. on November 26, 2022, Plaintiff dined at an empty
15 Panera Bread, given that it was the Thanksgiving Day weekend, as he worked on
16 revising his latest book, *Modern Matthew: Good News for Today—College*
17 *Edition*. As a regular customer, Plaintiff pays a monthly subscription as a member
18 of Panera Bread’s “Sip Club,” which allowed him to have a virtually endless
19 supply of hot and cold beverages. After a server who was mutually familiar with
20 Plaintiff was cleaning tables and assured him that she would watch his items. At
21 the same time, he went a few doors down to Kabuki Japanese Restaurant for
22 takeout. Plaintiff left Panera Bread for approximately ten minutes. As he walked
23 back to Panera, he noticed the server speaking with a woman sitting in a car to pick
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1 up her Panera Bread order. The woman asked Plaintiff if the items at the now
2 empty table were his. After answering in the affirmative, she stated that a White
3 male on a skateboard had just scooped them up and skated away in a specific
4 direction. Plaintiff dropped his food and ran in that direction but found no one
5 fitting the woman's description.
6

7 9. After attempting to locate the thief, Plaintiff returned to Panera Bread.
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9 The server apologized profusely and said that her manager, Sonya, called her
10 away, which left my belongings vulnerable to theft. She said it all happened so fast
11 and that she was gone for no more than 30 seconds. She also stated that she noticed
12 a suspicious-looking white male walking around outside the full glass windows
13 near the table where Plaintiff was sitting and that he would leave momentarily
14 when he saw her eyeing him and then return. Plaintiff asked the server to write
15 down a description of the thief, which she did, using an available felt-tipped pen
16 and two pieces of scratch paper [see Exhibit 2 and Exhibit 3].
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19 10. Still reeling from the incident, Plaintiff composed himself enough to
20 return to his office nine miles away, retrieve his second cell phone, a Samsung
21 A10e with a number ending in 6224, to call the Los Angeles County Sheriff's
22 Department (LASD) in Cerritos, California, and report the crime [see Exhibit 4].
23 Plaintiff considered it curious that Sonya, the manager, asked him if she could take
24 a photograph of this document, which he allowed. As a psychologist using his
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1 experience as a former detective-trained Assistant-Officer-In-Charge (AOIC) with
2 the LAPD, who trained detectives on LAPD's Detective Case Tracking System
3 (DCTS), Plaintiff was able to ascertain that it was the FBI who stole his items.
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5 11. Fighting to keep his composure, Plaintiff sensed that the precise timing
6 of his being away from his table, the server being conveniently called away, and
7 the actual theft of said items were more than coincidental. It seemed like an
8 orchestrated effort, especially since Sonya, the manager, was cavalier, smug,
9 insensitive, and defiant about Plaintiff's tremendous loss. Three months later,
10 Plaintiff learned that Deputy Mutum, the deputy sent to take the report, reached a
11 similar conclusion. He wrote in his Incident Report: "I spoke with the store
12 manager (Sonya fh/adult nfd) and asked if her surveillance camera's [*sic*] captured
13 the crime, to which she replied, 'Yea but you'll need a court subpoena to view it'
14 as she grinned at me, as if she was proud.'" [See Exhibit 5.] Plaintiff believes that
15 the FBI coordinated with Sonya, which would make her an accomplice to
16 conspiracy and larceny if true, by having one agent call her from a vehicle nearby
17 to have her summon the server away from Plaintiff's table, which afforded the
18 second agent, posing as "a random homeless man," to confiscate Plaintiff items
19 post haste. With the full backing of her FBI collaborators, Sonya, who at 5 feet 4
20 inches weighs 110 pounds, was emboldened to disrespectfully—nay,
21 sarcastically—stand up to a mere LASD deputy with 15 years of service.
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1 12. Significantly, Plaintiff's training, education, and travels are at the heart
2 of and factor largely into the FBI's motivation to steal said items. Such background
3 is presented forthwith:
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5 13. Since the screen on the Surface Pro4 was unlocked, once in their
6 possession, FBI agents then deleted Plaintiff's files after no doubt copying them in
7 an effort to find incriminating evidence against him, given that he has traveled to
8 over 80 countries, territories, and islands from 1987 to 2019 in his work as a
9 researcher in religious and social studies. Plaintiff has been a university instructor
10 of comparative religions for 30 years and has conducted research studies in
11 surgical and medical procedures relative to the bloodless treatment for Jehovah's
12 Witnesses. Plaintiff is also a seminary-trained ordained minister and has
13 membership in the American College of Surgeons (ACS), American Psychological
14 Association (APA), and American Medical Association (AMA).
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16 14. Among the countries Plaintiff has traveled to in conducting research are
17 China, the Soviet Union, and Cuba, all of which happened to have a capricious
18 relationship with the U.S. and which justifiably prompted red flags in the FBI's
19 system.
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21 15. China: After touring India to study Hinduism, Buddhism, Jainism, and
22 Sikhism firsthand, Plaintiff made one of his three trips to China for an up close and
23 personal look at Confucianism and Daoism. Plaintiff had taught these Eastern
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1 religion courses—as well as Judaism, Christianity, and Islam—at the start of his
2 career as a university instructor. Given that tension between the U.S. and China
3 has intensified in recent years, the FBI capitalized on Plaintiff's trips there as an
4 opportunity to frame him for spying for the Chinese. This became evident in email
5 exchanges between Plaintiff and Dr. Don K. Nakayama, a fellow American
6 College of Surgeons (ACS) member and editor of the journal *The American*
7 *Surgeon*.
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10 16. On December 13, 2022, at 10:43 p.m., Plaintiff wrote the following
11 email: “Dear Dr. Don K. Nakayama, I hope this email finds you well. I am hoping
12 that you can send me a copy of the manuscript # ASU-22-0636 entitled ‘Surgeon
13 Anxiety and Jehovah’s Witnesses: Effective Intervention—A Pilot Study,’ which I
14 submitted to *The American Surgeon*. I am no longer in possession of the file since
15 both my primary and backup laptops were stolen. Thank you for your time, sir.
16 Kind regards, Firpo Carr, PhD.”
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20 17. On December 14a, 2022, at 10:24 a.m. Plaintiff wrote the following
21 email: “Dear Dr. Don K. Nakayama, I have received the manuscript that I
22 requested. In her due diligence, Jessica sent it posthaste as per your direction.
23 Thank you very much. Although I presented an updated, more robust version of the
24 manuscript via a PowerPoint presentation at Clinical Congress 2022 this past
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1 October, it is beneficial to retain the original. Thank you again for your time and
2 consideration, sir. Kind regards, Firpo.”

3 18. On December 14b, 2022, at 12:07 p.m., Plaintiff received the following
4 email, allegedly from Dr. Don K. Nakayama: “Thank you. Remember there is a
5 limit of four figures and tables. – DKN.” [See Exhibit 6.]. The brief, suspicious,
6 nonsensical email appears to be spoofed. The email profile photograph of Dr.
7 Nakayama [see Exhibit 7], who is Japanese American [see Exhibit 8], appears to
8 be deep fake or photoshopped to make him appear to be a Communist Chinese
9 military official wearing the traditional military hat [see Exhibit 9].

10 19. On December 14c, 2022, at 1:01 p.m., Plaintiff sent the following email
11 to his alternate email address, firpocarr@firpocarr.com: “Someone has spoofed this
12 reply email and photo of Japanese surgeon Dr. Don K. Nakayama to make him
13 appear to be a member of the Communist Chinese government. This is an apparent
14 attempt to tie me to the Chinese government. At [*sic*] it is, I have no ties
15 whatsoever to either the Chinese government or to, any communist government, or
16 any country or nation that the U.S. is an enemy.” As far as Plaintiff knows, there is
17 not now nor has there ever been an online photo of Dr. Nakayama in Communist
18 Chinese military apparel. A stressed Plaintiff concluded that it is improbable that
19 such a sophisticated stratagem to paint Dr. Nakayama as a Communist Chinese
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1 military official and tie him to Plaintiff would be employed by “a random homeless
2 man” who is desirous of framing Plaintiff for espionage.

3 20. Soviet Union: Moreover, after assisting the Soviets in modernizing the
4 catalog at what was then called the Saltykov Shchedrin State Public Library during
5 his travel to the Soviet Union, January 1 – 14, 1989, the Soviets declared Plaintiff
6 their “Special Guest.” They then allowed Plaintiff to take, for the first time, color
7 photographs of pages from the world’s oldest, most complete Hebrew Bible (Old
8 Testament), the Codex Leningrad B19a. This newsworthy event captured the
9 attention of various news organizations, including the *Los Angeles Times* (August
10 4, 1990, “Southern California File,” by John Dart, Religious Writer) and *Biblical*
11 *Archaeology Review* (September/October 1992, Vol. 18, No. 5, “Firpo W. Carr
12 Was First”).

13 21. Cuba: Additionally, when Plaintiff was unexpectedly invited to travel to
14 Cuba in 2002 by a friend (“Willie”) of a friend (“Lucy”) who was a travel agent,
15 President Fidel Castro arranged for Plaintiff to present his findings on racism in the
16 dictionary on state-run national television. Plaintiff had read and studied *Webster’s*
17 *Ninth New Collegiate Dictionary* in 1994 and subsequently documented the
18 astonishing, consistent thread of anti-Black racism in his book *Wicked Words:*
19 *Poisoned Minds—Racism in the Dictionary* (1997). After Lucy told her Cuban
20 sponsor of the book, its existence eventually reached the ears of President Castro.
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1 Plaintiff was unaware that his findings would appeal to the communist leader and
2 had no idea that Castro would invite him to speak to the Cuban people.

3 22. That Plaintiff traveled to the Soviet Union to study biblical manuscripts
4 and to Cuba to study the socio-cultural dynamic when juxtaposed with life in
5 America was undoubtedly at the core of a FISA judge's decision to grant a FISA
6 warrant wherein Plaintiff is subject. However, Plaintiff is convinced that it was not
7 the *intent* of the FISA judge to grant the FBI permission to break the law. More
8 specifically, Plaintiff also feels that his visits to these countries notwithstanding,
9 the FISA judge's decision does not give the FBI a license to find Plaintiff guilty of
10 espionage against the United States of America, especially provided that, until the
11 present, the U.S. still permits travel to these destinations. In short, the FBI has
12 conspired to injure Plaintiff, to procure him to be charged or arrested for
13 espionage.
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15 23. Plaintiff purchased a new laptop computer from Best Buy, 12118
16 Lakewood Blvd., Downey, California, on November 27, 2022, the next day after
17 the FBI theft. Having been an instructor at the University of Phoenix (UOPX) who
18 has taught computer-related and other courses for nearly 30 years, Plaintiff
19 attempted to access his two backup cloud drives (One Drive by the University of
20 Phoenix and his personal Google Drive) in hopes of retrieving his files. Plaintiff
21 reasoned that a random "homeless man" would be either satisfied or thrilled with
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1 the money he hoped to receive from the computers he stole and would neither
2 likely have the know-how to reach files on cloud drives nor have any use for said
3 files. To Plaintiff's great disappointment, virtually all files going back years on
4 these cloud drives had been deleted.

6 24. The FBI obtained Plaintiff's passwords from his hard drives and deleted
7 files, pictures, PowerPoint slides, and video presentations. Desperately hoping for
8 a miracle to verify that he was not overlooking any files, Plaintiff contacted UOPX
9 Faculty Technical Support in hopes of locating files in some nook and cranny in
10 cyberspace. Disappointingly he was told that essentially all files had indeed been
11 deleted, which was a highly unusual, deliberate act. Though crestfallen, this
12 troubling information strengthened Plaintiff's suspicions that deleting his files in
13 the backup cloud drives was nefarious. He surmised that this was not the work of a
14 random, highly skilled technological whiz of a man living on the street. Moreover,
15 no attempt was made to access Plaintiff's bank accounts or steal his identity.
16 Instead, the perpetrators wanted to obtain Plaintiff's invaluable, innocuous
17 information in his computer files and deny Plaintiff access.

23 25. In the face of all odds, Plaintiff took an even deeper dive into where the
24 files were, resting heavily on his substantive training over the decades. To bolster
25 his confidence and escape depression, Plaintiff reminded himself that with a Ph.D.
26 in computer information systems, a master's degree in management, and a
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1 bachelor's degree in information systems management, all acquired during his ten
2 years (1979 – 1989) of employment with International Business Machines (IBM),
3 he could find something that perhaps UOPX Technical Support may have missed.
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5 26. Furthermore, as clearer thinking repositioned the trauma that the FBI
6 theft caused, Plaintiff began to gather himself as he revisited his qualifications. He
7 mused that he worked as a civilian for the LAPD from 1994 – 2004, primarily as a
8 Systems Analyst II, but also as an Assistant-Officer-in-Charge (AOIC) with the
9 rank equivalency of sergeant.
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11 27. As a Systems Analyst II, Plaintiff specialized in cybercrime. Because of
12 his computer proficiency, Plaintiff was subpoenaed as an expert witness for the
13 LAPD and appeared before Judge Lance Ito in 2002. Judge Ito had presided over
14 the O.J. Simpson murder trial in 1995, and his wife, Margret York, was the first
15 woman to be promoted to the rank of Deputy Chief in the LAPD in 2000, during
16 the time Plaintiff was with the LAPD. Being immersed in the totality of this law-
17 enforcement culture facilitated Plaintiff's perception of the FBI's illegal actions,
18 which further heightened his stress.
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23 28. Plaintiff's reassessment led to a breakthrough. He was pleased to find
24 the United States Patent and Trademark Office (USPTO) file correspondence and
25 information related to his trademark issuance and patent application in a cloud
26 drive that the FBI and UOPX Faculty Support missed. His excitement, however,
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1 was short-lived. When he attempted to open the files, he discovered that each one
2 had been systematically corrupted sophisticatedly, as indicated by a small peach-
3 colored square in the lower left of the file icon, whether an Adobe in a Portable
4 Document Format (.pdf) or Microsoft Word file. Plaintiff took a photograph of the
5 screen displaying the files. [See Exhibit 10]. To Plaintiff's consternation, these
6 cloud drive files have since mysteriously disappeared, a feat that the FBI's cyber
7 operations no doubt easily performed.

10 29. Starting with the act of larceny, the following chronological presentation
11 is of a few instances when Plaintiff reported to various law-enforcement agencies
12 that he was being stalked, harassed, nearly run off the freeway, and other ways
13 threatened by the FBI's illegal activities. These events paint a clearer picture of the
14 circumstances surrounding the theft of Plaintiff's personal property:
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17 30. On Saturday, **November 26, 2022**, the FBI wrongfully took and
18 withheld from Plaintiff's possession personal property in the form of computers
19 and other articles, intending to permanently deprive Plaintiff of the benefit of said
20 property as he dined at Panera Bread in Cerritos, California.
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23 31. On Sunday, **November 27, 2022**, the day after the theft, Plaintiff
24 received the following text message on his Samsung A10e (number ending in
25 6224): "Thanks for filing a stolen device claim with Assurant for your T-Mobile
26 device." The stolen device was Plaintiff's Samsung A32-5G (number ending in
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1 8440), which the FBI wrongfully took and withheld from Plaintiff's possession
2 with the intention to permanently deprive Plaintiff the benefit of said property as
3 he dined at Panera Bread in Cerritos, California.
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5 32. On Monday, **November 28, 2022a (5:42 a.m.)**, Plaintiff received the
6 following text message on his Samsung A10e (number ending in 6224): "Assurant:
7 Here's your tracking number for your replacement device shipped 11/27/2022."
8
9 This necessary action was because the FBI wrongfully took and withheld from
10 Plaintiff's possession his Samsung A32-5G number ending in 8440 with the
11 intention to permanently deprive Plaintiff of the benefit and use of this cell phone.
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13 33. On Monday, **November 28, 2022b**, Plaintiff purchased a new computer
14 laptop from Best Buy (00008722), 12118 Lakewood Blvd., Downey, California in
15 the amount of \$663.99 because the FBI wrongfully took and withheld from
16 Plaintiff's Microsoft Surface Pro 4 tablet computer possession with the intention to
17 permanently deprive Plaintiff the benefit of said tablet computer.
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19 34. On Monday, **November 28, 2022c**, Detective Aguirre of the LASD
20 Cerritos station told Plaintiff that a detective was sent to Panera Bread to view the
21 video of larceny being committed as the undercover FBI agent stole Plaintiff's
22 computer items on November 26, 2022. The reality of the actual existence of this
23 hard evidence stressed Plaintiff out even more.
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1 35. On Monday, **November 28d, 2022**, Panera Bread manager Dante, who
2 was off work during the evening of the theft and to whom Sonya reports (see
3 paragraph 9), left the following voicemail on Plaintiff's cell phone number ending
4 in 6224: "Hi Firpo, this is Dante from Panera Bread. I was calling to talk to you
5 about what happened on Saturday [November 26, 2022]. First, I'd like to
6 apologize. We've done something that we hope doesn't happen, and I know you
7 typically feel safe in the café, so I do apologize about that situation. But we're
8 trying to do what we can to help you. So, I just had a couple of questions regarding
9 that night." This well-intended message reminded Plaintiff of the enormity of his
10 loss, exacerbated by the knowledge that Sonya may have been complicit.
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12 36. On Tuesday, **November 29, 2022**, Plaintiff received his replacement
13 cell phone, a Samsung A32-5G, with the number ending in 8440. This replacement
14 cell phone was necessary because the FBI wrongfully took and withheld from
15 Plaintiff his original cell phone, intending to permanently deprive Plaintiff of the
16 benefit of its usage.
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18 37. On Wednesday, **December 7, 2022**, Plaintiff was in Murietta,
19 California, to teach a class at the University of Phoenix Learning Center when he
20 saw a man fitting the description of the undercover FBI agent (Agent A for this
21 date entry) described by the Panera Bread server. Agent A appeared at the Shell
22 gas station off the Murietta Hot Springs exit of the 15 freeway, where Plaintiff was
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1 getting gas before class. Agent A, with an empty gas container in hand, approached
2 Plaintiff, pretending that he was low on gas, and was unsure if he and his
3 “girlfriend” sitting in the passenger side front seat (another FBI agent, Agent B)
4 would make it to San Diego to get her car. After exchanging greeting pleasantries,
5 Agent A asked Plaintiff if Plaintiff could loan him some money for gas. Plaintiff
6 responded that he would rather pay directly for the gas with his debit card.
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8 Plaintiff, who suspected Agent A was indeed an FBI agent, had filled his own tank
9 and volunteered to pump Agent A’s gas. Plaintiff then asked Agent A how much
10 gas it takes to fill the tank. This simple question stumped Agent A, who needed to
11 determine the answer. Befuddled, Agent A asked his “girlfriend” partner, Agent B,
12 who confidently answered, “65 dollars.” It struck Plaintiff as odd that Agent B
13 knew precisely how much it took to fill the car, even though it was not hers. Agent
14 B now emerged from the passenger side with a box of jewelry in her hand and
15 gave Plaintiff the option to select any two that he desired to thank him for his
16 generosity, saying that it would be a nice gift for Plaintiff’s “wife or girlfriend.”
17 This kind gesture of gratitude alerted Plaintiff that these were indeed FBI agents.
18 After declining the offer, it occurred to Plaintiff that Agent B just said, “wife or
19 girlfriend.” He pondered, “Why didn’t she include daughter, granddaughter,
20 mother, sister, or other female relative? How does she know that I am not gay, and
21 don’t have a female significant other?” Plaintiff knew the answers to these
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1 questions. He was acutely aware that the FBI knew that his mother was deceased,
2 that he was estranged from his daughter, granddaughter, and sisters, and that, as a
3 Christian minister, he was neither gay nor bisexual. These two agents disguised
4 themselves at the Shell station, intending to hinder Plaintiff's enjoyment of peace
5 and privacy.
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8 38. On Thursday, **December 8, 2022**: Stressed and desperate, Plaintiff
9 discovered corrupted files after taking a deeper dive into one of his cloud drives.
10 This clearly showed that these filets were purposefully, deliberately, and
11 strategically corrupted. This act was further confirmation that the FBI wrongfully
12 took and withheld from Plaintiff's possession his computer files with the intention
13 to deprive Plaintiff of the benefit of these files permanently.
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16 39. On Tuesday, **December 13, 2022**: Plaintiff emails Dr. Don K.
17 Nakayama, editor of *The American Surgeon* and a fellow member American
18 College of Surgeons, requesting a copy of the manuscript he submitted since the
19 original was on one of Plaintiff's computers that the FBI wrongfully took and
20 withheld from Plaintiff's possession intending to permanently deprive Plaintiff the
21 benefit of having the file on the stolen computer. The FBI conspired to oppress
22 Plaintiff by denying him the opportunity to be published.
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26 40. On Wednesday, **December 14a, 2022**: Plaintiff sent Nakayama a
27 grateful email acknowledging receipt of the manuscript file, unaware that the FBI
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1 was conspiring to injure Plaintiff to procure him to be charged or arrested for
2 espionage.

3 41. On Thursday, **December 14b, 2022**, Plaintiff received a bogus email
4 from the FBI pretending to be Nakayama, with Nakayama (who is Japanese
5 American) dressed in Communist Chinese military attire, unaware that the FBI was
6 conspiring to injure Plaintiff, to procure him to be charged or arrested for
7 espionage.
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10 42. On Friday, **December 14c, 2022**, Plaintiff forwarded a copy of said
11 incriminating email to his alternate email address, fearing that the FBI's cyber
12 operations unit might delete it. This unit had already hijacked Plaintiff's Gmail
13 account several times, forcing Plaintiff to recover it repeatedly. Already struggling
14 emotionally under the duress of having the FBI steal his items, Plaintiff felt that the
15 FBI's intervention in emails between him and Nakayama was one of the more
16 egregious acts to sabotage Plaintiff's career. All the while, Plaintiff was unaware
17 that the FBI was conspiring to injure Plaintiff to procure him to be charged or
18 arrested for espionage.
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20 43. On Thursday, **December 15, 2022**, Plaintiff filed a complaint with the
21 DOJ Office of Professional Responsibility and received a submission
22 acknowledgment. [See Exhibit 11.] Plaintiff had reason to be downcast given that
23 since a FISA warrant is involved, the DOJ Office of Professional Responsibility
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1 would pervert or obstruct justice or the due administration of the laws in an effort
2 to preserve the FISA warrant arrangement.

3 44. On Tuesday, **January 3, 2023a**, Plaintiff called the Department of
4 Justice Office of the Inspector General Investigative Division three times on the
5 morning of Tuesday, January 3, 2023 (7:36 am, 7:43 am, and 8:17 am, all Pacific
6 Standard Time). There was no answer the first time. It rang several times until it
7 switched to a busy signal. Someone answered but was silent before they
8 disconnected the second time. And, like the first time, there was no answer the
9 third time. Plaintiff was convinced that the Department of Justice Office of the
10 Inspector General Investigative Division was doubling down on their conspiracy to
11 pervert or obstruct justice or the due administration of the laws in an effort to
12 preserve the FISA warrant process.
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17 45. On Tuesday, **January 3, 2023b**, at 8:30 a.m., Plaintiff submitted an
18 official complaint to the U.S. Department of Justice Office of the Inspector
19 General at 8:29 a.m. [See Exhibit 12]. In Plaintiff's words, submitting a complaint
20 to the Department of Justice was tantamount to the "fox guarding the henhouse."
21 Plaintiff was sure that the Department of Justice Office of the Inspector General
22 was bolstering its position to conspire to pervert or obstruct justice or the due
23 administration of the laws in an effort to preserve the FISA warrant process.
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1 46. On Tuesday, **January 6, 2023**, Plaintiff called the Department of Justice
2 and creatively reached an employee ("Cheryl"). After Plaintiff explained to a
3 startled Cheryl how he managed to get her, he related that he was attempting to call
4 someone in the OIG's Investigative Division but that the lines were not working
5 correctly. Cheryl nervously stated that it was not her section but that he was trying
6 to connect with, but that she would transfer Plaintiff to "Anthony." Plaintiff
7 repeated to Anthony how he reached him, after which Anthony apologized for the
8 lines not working and said he would report that the main number was inoperative.
9 After consulting his supervisor, Anthony provided Plaintiff with two alternative
10 telephone numbers for the OIG Investigative Division. Plaintiff perceived these
11 tactics as part of the conspiracy to pervert or obstruct justice or the due
12 administration of the laws in an effort to preserve the FISA warrant process.
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17 47. On Thursday, **January 12, 2023**, Plaintiff called the main telephone
18 number for the OIG Investigative Division and spoke with a person identifying
19 herself as Operator 6. When Plaintiff asked her approximately how long it would
20 take for his complaint to be addressed, she stated that there was no time frame, and
21 neither was there a way to expedite the process. Plaintiff expressed his
22 disappointment and hoped to be still alive if and when they got around to his
23 complaint because he had good reason to believe that the FBI had bugged his cell
24 phones. He shared that since he submitted the complaint, numerous suspicious
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1 cars, with high-intensity bright headlights, have been following him, and that any
2 and everywhere he went--whether to the grocery store, gym, or café shop--some
3 suspicious character(s) invariably showed up, some with a white earpiece in many
4 cases. Plaintiff surmised that he was being put off by Operator 6 as part of the
5 conspiracy to pervert or obstruct justice or the due administration of the laws in an
6 effort to preserve the FISA warrant process. The FBI stalked Plaintiff with the
7 intention to harass him by aggressively surveilling him, causing Plaintiff distress
8 and fearing for his life and safety.

11
12 48. On Tuesday, **January 24, 2023**, Plaintiff called the LASD station in
13 Cerritos, California, to inquire about the investigation of his items stolen from
14 Panera Bread and spoke with Detective Aguirre. According to Detective Aguirre, a
15 detective was sent to Panera Bread to view the video of the crime, which clearly
16 showed Plaintiff's items being stolen on November 26, 2022. Regrettably, for
17 nearly two months, no one from the Sheriff's Department ever contacted Plaintiff.
18 Moreover, Detective Aguirre told Plaintiff that the case was open indefinitely.
19 Plaintiff believes that the stalling on the part of Detective Aguirre was inspired by
20 the FBI and is part of the conspiracy to pervert or obstruct justice or the due
21 administration of the laws.

22 49. On Thursday, **February 9a, 2023**, Plaintiff reported to the LASD
23 Lakewood station [see Exhibit 13] that a stalker sat outside Plaintiff's office in a
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1 white Nissan with license plate number 8BDE800. [See Exhibit 14.] The stalker
2 boldly and calmly sat in his car as Plaintiff took a cell phone photo of the license
3 plate and then sped off *after* Plaintiff crossed the street out of earshot and called
4 the police. This is one of the many ways Plaintiff knows his phone is bugged. All
5 the while, the stalker's accomplice was inside the storage facility where Plaintiff's
6 converted storage unit office is located, pretending to be doing business. This
7 second stalker's car was a Mitsubishi Mirage, license plate number 8WFA981 [See
8 Exhibit 15], which was parked within the facility at the time. When Plaintiff took a
9 cell phone photo of the license plate and, after that called the police—again, out of
10 earshot—the second stalker suddenly and abruptly stopped what he was doing,
11 hastily entered the vehicle, and drove off before the police arrived. Since both
12 stalkers, undercover FBI agents, left the scene before the police arrived, Plaintiff
13 called back and canceled the calls. The FBI stalked Plaintiff with the intention to
14 harass him by aggressively surveilling him, causing Plaintiff to be distressed and to
15 be in fear for his life and safety.

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22 50. On Thursday, **February 9b, 2023**, Plaintiff reported to the Downey,
23 California police department [see Exhibit 16] that a red Ford Mustang with a dark
24 rear windshield, license plate number 8VKP441 [see Exhibit 17] had been stalking
25 him. Like so many other cars used by the FBI, this vehicle's front windshield was
26 illegally tinted. [See Exhibit 18.] The FBI stalked Plaintiff with the intention to
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1 harass him by aggressively surveilling him, causing Plaintiff to be distressed and to
2 be in fear for his life and safety.

3
4 51. On Thursday, **February 9c, 2023**, Plaintiff, an avid reader, was
5 disturbed to learn that the FBI's ethics, attitudes, behaviors, and philosophical
6 outlook had degraded considerably, according to former Special Agent Nicole
7 Parker, who testified before the House Select Subcommittee on the Weaponization
8 of the Federal Government on this date and made the following statement: "The
9 Bureau's mission should have remained the same, but its priorities and governing
10 principles shifted dramatically. The FBI became politically weaponized starting
11 from the top in Washington and trickling down to the field offices," including the
12 Los Angeles field office. (Ex-FBI agent Nicole Parker: Bureau 'politically
13 weaponized, starting from the top' (nypost.com)) Plaintiff was currently
14
15 experiencing the nefarious machinations of a "weaponized" FBI whose "priorities
16 and governing principles shifted dramatically." Moreover, the Chair of the House
17 Select Subcommittee on the Weaponization of the Federal Government,
18 Representative Jim Jordan, at this same hearing declared: "In my time in Congress,
19 I have never seen anything like this. Dozens and dozens of whistleblowers FBI
20 agents coming to us, talking about what's going on, the political nature at the
21 Justice Department." Plaintiff was victimized by the degradation of FBI culture
22 that "dozens and dozens of whistleblower FBI agents" are enduring. These
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1 sentiments align and are consistent with the FBI's conspiracy against Plaintiff to
2 pervert or obstruct justice or the due administration of the laws.

3
4 52. On Friday, **February 10a, 2023**, Plaintiff reported to the LAPD front
5 desk officer at 77th Street Division station [see Exhibit 19 for front of Officer
6 Perez's card; see Exhibit 20 for back of card] that a gray Acura that he had seen
7 following him before he believed had now been chasing him on the 105-freeway
8 westbound. Since the vehicle had illegally tinted front windows as it followed him
9 previously in the Bellflower area, Plaintiff photographed it before when it was
10 parked. [See Exhibit 21 for gray Acura license plate # 7UBW372.] The FBI stalked
11 Plaintiff with the intention to harass him by aggressively surveilling him, causing
12 Plaintiff to be distressed and to be in fear for his life and safety.

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16 53. On Friday, **February 10b, 2023**, Plaintiff reported to the California
17 Highway Patrol [see Exhibit 22 for narrative] that he believed a black Chevrolet
18 Camaro with an illegally tinted front windshield, license plate number 9AGR984,
19 which he had seen and photographed before [see Exhibit 23], had chased him on
20 freeways including the 110 and 405. The FBI stalked Plaintiff with the intention to
21 harass him by aggressively surveilling him, causing Plaintiff to be distressed and to
22 be in fear for his life and safety.

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26 54. On Tuesday, **February 14a, 2023**, an FBI agent that Plaintiff had seen
27 before followed Plaintiff to Panera Bread, Downey, CA. [See Exhibit 24.] Plaintiff
28

1 was able to take a clear photo of this agent. The FBI stalked Plaintiff with the
2 intention to harass him by aggressively surveilling him, causing Plaintiff to be
3 distressed and to be in fear for his life and safety.
4

5 55. On Tuesday, **February 14b, 2023**, Plaintiff discovered, to his dismay,
6 that FBI agents are growing more aggressive. While Plaintiff was peacefully sitting
7 in his car in a secluded shopping mall parking lot in the City of Downey, two
8 vehicles driven by undercover FBI agents sped into parking spaces near him. When
9 Plaintiff noticed their aggressive driving, he turned on his cellphone video. One of
10 them, a Black male, exited his car and approached Plaintiff's car threateningly as
11 Plaintiff remained in the driver's seat. The agent then initiated a confrontation with
12 Plaintiff. The other agent, a Latina, remained in the background as she avoided
13 being recorded on video. Wanting to prevent escalation, Plaintiff left the area and
14 proceeded directly to the Downey police station, where he related what occurred to
15 the desk officer who gave him a card [see Exhibit 25] as well as an incident report
16 [see Exhibit 26], along with a narrative page. [See Exhibit 27.] Before leaving the
17 scene, Plaintiff had the presence of mind to photograph the cars of both agents.
18 The male Black agent's car had the customary illegally tinted front windshield [see
19 Exhibit 28], while the Latina agent's car was more traditional [see Exhibit 29]. The
20 FBI stalked Plaintiff with the intention to harass him by aggressively surveilling
21 him, causing Plaintiff to be distressed and to be in fear for his life and safety.
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1 56. On Saturday, **February 18, 2023**, the FBI began acting with more
2 aggression and bravado. Plaintiff noticed a car with extremely high front beams
3 inside the storage facility where he has an office. When Plaintiff approached to
4 investigate, the vehicle sped toward him and then turned sharply to the left down
5 the roadway of about 100 yards separating two storage columns. Knowing that the
6 driver would have to escape through the only exit in the facility, Plaintiff waited
7 for the driver near the keypad, where he had to key out to exit. As the driver
8 lowered his window to access the keypad, Plaintiff noticed it was a white male in
9 his fifties. The driver was taciturn as he keyed out. While he did so, Plaintiff got a
10 brief description of the car and the license plate number (GLC583), which he said
11 aloud repeatedly so as not to forget. Plaintiff hurried back to his unit to retrieve his
12 cell phone and immediately dialed 911. After being connected to the dispatcher,
13 Plaintiff reported the incident. At least three patrol units and an aerial unit
14 helicopter were dispatched. The patrol cars were driven by Deputy Hocking (S/N
15 65759), Deputy Sandoval (S/N 637314), and training Deputy Milton. Plaintiff
16 implored the deputies to watch the facility's closed circuit television (CCTV) as
17 soon as the office opened and to check the computer to see who keyed out at that
18 precise time, which was about 8:24 p.m. The deputies said it would take some time
19 to get someone to watch the video. Deputy Sandoval handed Plaintiff the "Report
20 Information and Victims' Bill of Rights" with the Report Number LKD23049-
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1 0280 [see Exhibit 30] and said she would return to work a few days later. At that
2 time, Plaintiff asked why another deputy could not be available to watch the video
3 as soon as possible. As if rehearsed, all the deputies present almost stated in unison
4 that the same deputy (Sandoval) would stay on the case without interference from
5 another deputy. The FBI conspired with the LASD Lakewood station to protect the
6 identity of the undercover agent that stalked Plaintiff with intentions to harass him
7 by aggressively surveilling him, causing Plaintiff to be distressed and in fear for
8 his life and safety.
9

11
12 57. On or about Tuesday, **February 28, 2023**, Plaintiff called the LASD
13 Lakewood station and spoke with station Watch Commanders Lieutenants
14 Maldonado and Ridley at separate times in an earnest effort to persuade them to
15 dispatch a deputy to view the CCTV video in question, but to no avail. This
16 stalling effort is consistent with the FBI's conspiracy against Plaintiff to pervert or
17 obstruct justice or the due administration of the laws.
18

19
20 58. On Wednesday, **March 1, 2023**, at approximately 5:45 p.m., LASD
21 Deputy Sandoval and her partner visited the business office of Bellflower Self
22 Storage, 14822 Lakewood Blvd, Bellflower, California, while Plaintiff was
23 preparing to teach a 6:00 p.m. comparative religion class at the Ontario, California,
24 campus of the University of Phoenix. After viewing the video, Deputy Sandoval
25 called Plaintiff when he was about to start class and stated that she saw nothing out
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1 of the ordinary or even remotely resembling the incident that Plaintiff described.
2 After fast-forwarding and watching the CCTV video about an hour before and after
3 the time Plaintiff stated that the suspect keyed out on Saturday, February 18, 2023,
4 at 8:24 p.m., she noted that all she saw was Plaintiff waiting outside the front gate
5 of Bellflower Self Storage for and a vehicle slowly and calmly leaving at the same
6 time. Plaintiff responded that, fearing for his safety, he never waited outside the
7 gate for deputies to arrive and that the FBI had about a week and a half (February
8 18, 2023 – March 1, 2023) to doctor the video. And then, Plaintiff asked Deputy
9 Sandoval, “Do you think I conjured up the suspect’s vehicle description and
10 license plate that’s in the incident report out of the air?” [See Exhibit 31.] Plaintiff
11 is convinced that the doctored or manipulated video is perhaps the most damning
12 evidence of the FBI’s conspiracy against Plaintiff to pervert or obstruct justice or
13 the due administration of the laws.
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19 59. On Thursday, **March 2, 2023**, Plaintiff called the LASD Lakewood
20 station to request Deputy Sandoval’s documented conclusion that the CCTV from
21 Saturday, February 18, 2023, was devoid of any of the alleged actions of a
22 perpetrator are reported by Plaintiff. Watch Commander Lieutenant Maldonado
23 refused to accommodate Plaintiff, prompting Plaintiff to call back to make an
24 appointment to speak with Captain Dan Holguin. However, Captain Holguin’s
25 secretary, Ariel, who Plaintiff had spoken with about two days before, again
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1 refused to either allow Plaintiff to speak with Captain Holguin or to make an
2 appointment to meet with him. As of this filing, Captain Holguin has not
3 responded to Plaintiff's calls. Plaintiff perceives that Captain Holguin's refusal to
4 speak with him is at the behest of the FBI as part of a conspiracy against Plaintiff
5 to pervert or obstruct justice or the due administration of the laws.
6

7
8 60. Although the FBI has been surveilling Plaintiff since his first trip to the
9 Soviet Union in January 1989, they have significantly intensified their efforts in
10 the past several years—particularly the last six months, stalking him with fast cars
11 with illegally tinted front windshields. (See, for example, Exhibit 32.) Under the
12 direction of the DOJ, the FBI has bullied Plaintiff by enlisting its Cyber Ops unit to
13 wrest his 20-year Facebook account with its nearly 1,500 friends from him and
14 hijacked his Gmail account. Furthermore, the FBI has terrorized Plaintiff by
15 weaponizing specially modified bright headlights with rheostat control (i.e.,
16 control from dim to bright as opposed to clicking bright lights on and off). They
17 have been installed in older and later model vehicles, sometimes in one headlight
18 (see Exhibit 33), apparently designed to cause temporary blindness. These
19 extremely bright headlights are in excess of 300 lumens. (See Exhibit 34.)
20 Moreover, since Plaintiff's cell phones are bugged, the FBI knew of the ancient
21 coins he collected while in Tunis, Tunisia, when Plaintiff called an appraiser to
22 determine their value. When Plaintiff attended and lectured at the American
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1 College of Surgeons Clinical Congress 2022 from October 16 – 20, 2022, in San
 2 Diego, CA, FBI agents vandalized Plaintiff's office at Bellflower Self Storage and
 3 stole his ancient coins. Additionally, Plaintiff's car has a Global Position System
 4 (GPS) tracking device. Plaintiff knows this because he has often eluded agents
 5 following him. They invariably find him, flickering their extremely bright lights to
 6 taunt him, sending the message that he cannot escape their detection as they
 7 ceaselessly stalk him. The DOJ has dedicated substantial resources to prevent
 8 Plaintiff from filing this lawsuit as they are acutely aware of the potential
 9 precedent set facilitating the piercing of the FISA warrant and, in the process,
 10 pervert or obstruct justice or the due administration of the laws.

11 **V. CAUSES OF ACTION**

12 **FIRST CAUSE OF ACTION**

13 (Larceny. Grand theft of personal property)

14 (10 U.S. Code § 921 – Article 121(a)(1); California Penal Code § 487 PC)

15 61. Plaintiff realleges paragraphs 6, 8 through 10, 12, 13, 23, 24 through 36,
 16 and 38.

17 62. By doing the acts described above in Paragraphs 6, 8 through 10, 12, 13,
 18 23, 24 through 36, and 38, Defendants, while acting in an official capacity in their
 19 roles as federal government employees (Federal Tort Claims Act), committed the
 20 intentional tortious act of larceny by wrongfully taking and withholding Plaintiff's
 21

1 personal belongings thereby denying Plaintiff the use and benefit of these
 2 belongings, hence, entitling Plaintiff to recover damages pursuant to 10 U.S. Code
 3 § 921 – Article 121(a)(1). Defendants committed grand theft by the wrongful
 4 appropriation of Plaintiff's belongings, which are worth over \$950 pursuant to
 5 California Penal Code § 487 PC.
 6

7 SECOND CAUSE OF ACTION

8
 9 (Violation of civil rights. Conspiracy against rights)

10 (Title 18, U.S.C., Section 241; California Penal Code § 182 PC)

11
 12 63. Plaintiff realleges paragraphs 11, 15 through 22, 37, 39 through 48, 57.

13 64. By doing the acts described above in Paragraphs 11, 15 through 22, 37,
 14
 15 39 through 48, and 57, Defendants, while acting in an official capacity in their
 16 roles as federal government employees (Federal Tort Claims Act), caused and/or
 17 permitted the violation of Plaintiff's right to the free exercise or enjoyment of any
 18 rights so secured by conspiring against rights to injure, oppress, threaten, and
 19 intimidate Plaintiff, hence, entitling Plaintiff to recover damages pursuant to civil
 20 rights statute Title 18, U.S.C., Section 241. Defendants committed criminal
 21 conspiracy by conspiring to commit a crime and to procure Plaintiff to be charged
 22 for the crime of espionage and to pervert or obstruct justice or the due
 23 administration of the laws pursuant to California Penal Code § 182 PC.
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4 **THIRD CAUSE OF ACTION**

5 (Stalking)

6 (18 U.S. Code § 2261A)

7
8 65. Plaintiff realleges paragraphs 7, 49 through 56, and 58 through 60.

9 66. By doing the acts described above in Paragraphs 7, 49 through 56, and
10 58 through 60, Defendants, while acting in an official capacity in their roles as
11 federal government employees (Federal Tort Claims Act), acted to harass and
12 intimidate Plaintiff that placed him in reasonable fear of death or serious bodily
13 injury which caused substantial emotional distress, entitling Plaintiff to recover
14 damages pursuant to 18 U.S. Code § 2261A.
15

16
17 **VI. EXHAUSTION OF ALL ADMINISTRATIVE REMEDY**

18
19 67. Plaintiff is seeking judicial review after being purposefully ignored by
20 the DOJ after numerous attempts to get answers (see, e.g., Exhibit 11 and Exhibit
21 12 in connection with paragraphs 43 through 47). Disregarding Plaintiff rendered
22 the DOJ's decision as being "final" under § 10(c) of the APA, 5 U.S.C.S. § 704
23 (Darby v. Cisneros | Case Brief for Law School | LexisNexis). It became
24 abundantly clear to Plaintiff that "further administrative review would have been
25 futile," and that the decision-maker at the DOJ "would have abused his discretion
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1 by indefinitely extending the time limitations for administrative review” (Darby v.
 2 Cisneros | Case Brief for Law School | LexisNexis) to avoid potentially
 3 jeopardizing the FISA warrant arrangement. “Were courts free to impose an
 4 exhaustion requirement as a rule of judicial administration where agency actions
 5 had already become ‘final’ under § 10(c) of the APA, 5 U.S.C.S. § 704?
 6

7 ANSWER: No” (Darby v. Cisneros | Case Brief for Law School | LexisNexis).
 8

9 Ultimately, “The Court held that the exhaustion doctrine continued to apply as a
 10 matter of judicial discretion in cases not governed by the APA” (Darby v. Cisneros
 11 | Case Brief for Law School | LexisNexis). Plaintiff humbly requests the court to
 12 exercise its judicial discretion in this unusual FISA warrant case, which is “not
 13 governed by the APA,” and allow this lawsuit to proceed.
 14
 15

16 **Request for Permanent Injunctive Relief**

17
 18 70. Plaintiff requests the court to impose permanent injunctive relief by
 19 ordering the FBI to discontinue its thefts, conspiracies against Plaintiff’s civil rights,
 20 various acts of stalking, harassment, threats, intimidation, all cyberattacks, all
 21 disruptive acts against Plaintiff’s academic and business endeavors, and all other
 22 illegal acts that it has perpetrated against Plaintiff in perpetuity.
 23
 24

25 **Request for Relief**

26 WHEREFORE, the Plaintiff requests:
 27
 28

1 71. Compensation for damages, including general and special damages,
2 according to proof.

3 72. \$20,000,000.00
4

5 72. Any further relief of which the court may deem appropriate.

6 73. The return of all Plaintiff's stolen property, including computer files.
7

8 **Demand for a Jury Trial**

9 Plaintiff hereby requests a jury trial on all issues raised in this complaint.
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EXHIBIT 1

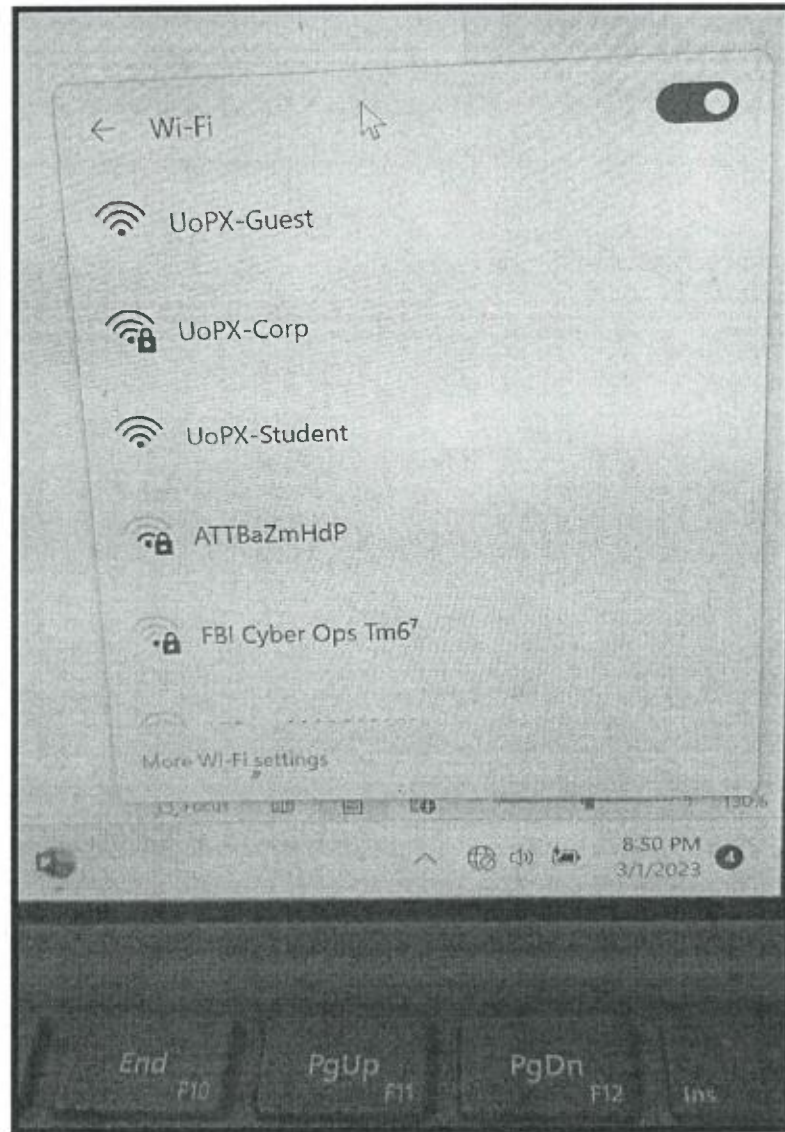


Exhibit 1

Photo showing the FBI's Wi-Fi network, March 1, 2023.

EXHIBIT 2

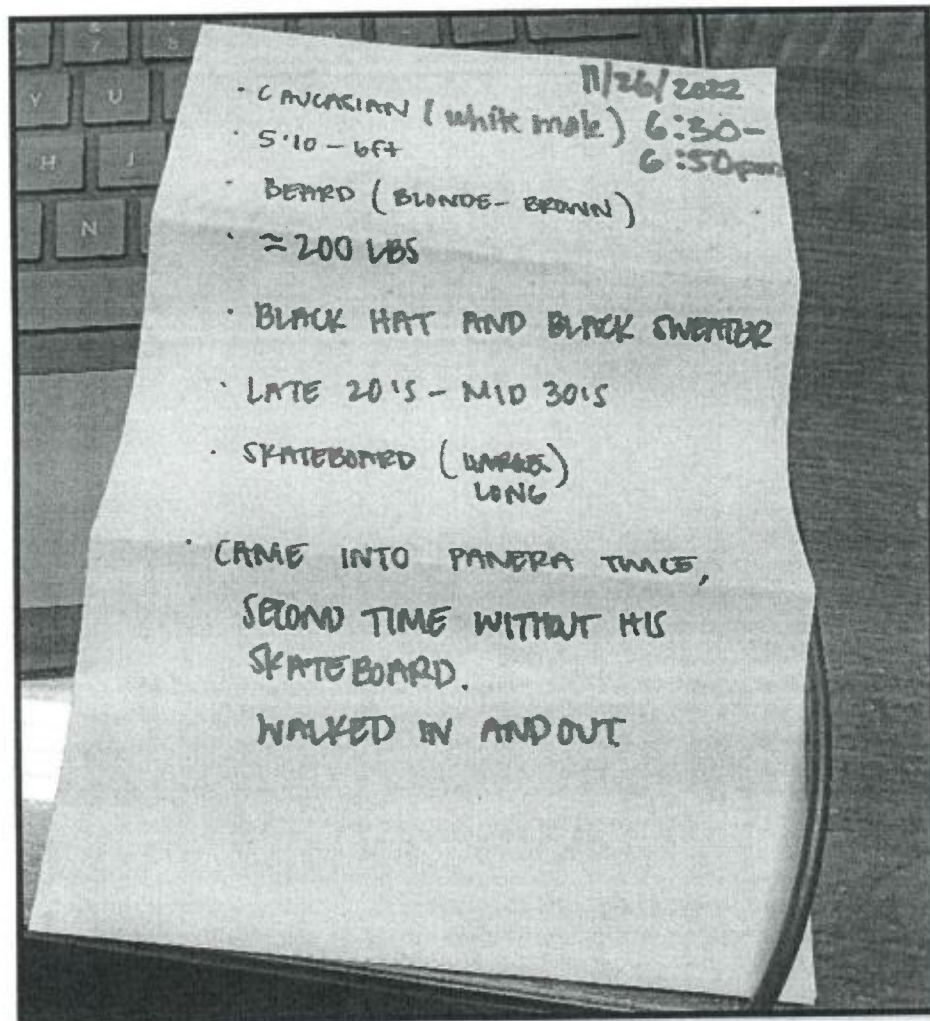


Exhibit 2

Page 1 of photo where server describes suspect, November 26, 2022.

EXHIBIT 3

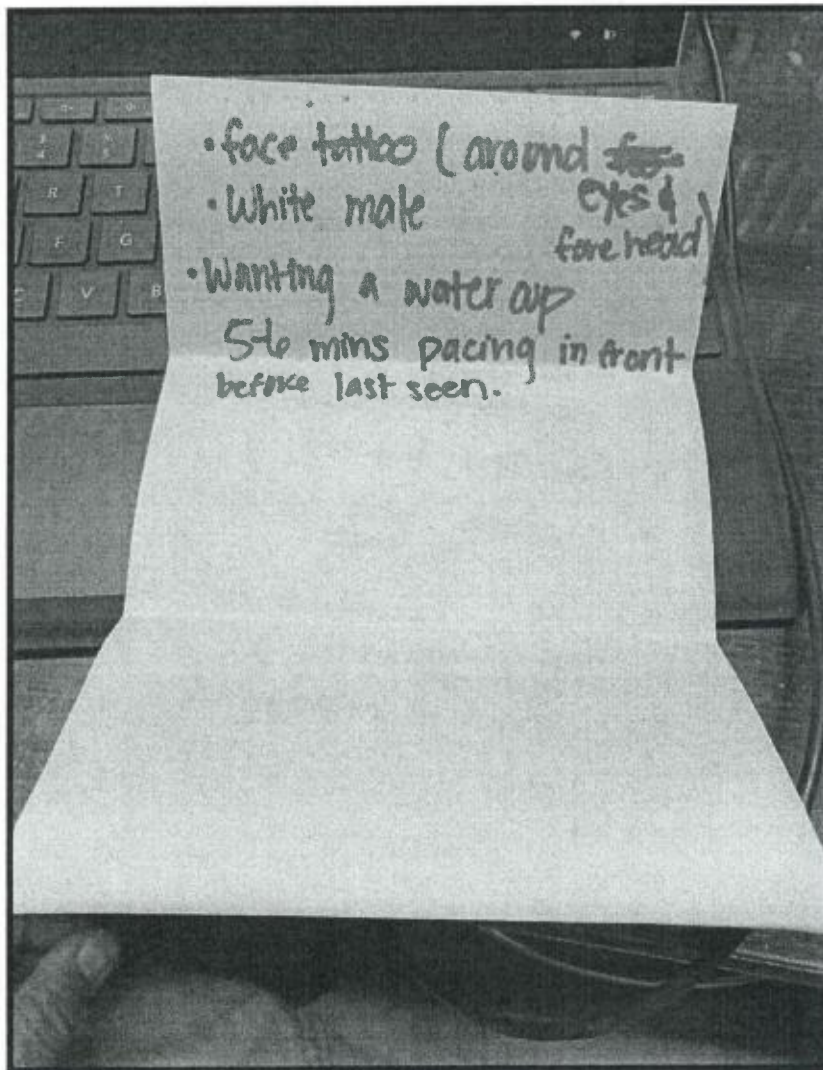


Exhibit 3

Page 2 of photo where server describes suspect, November 26, 2022.

EXHIBIT 4

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Report Information
and
Victims' Bill of Rights

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
1850

CERRITOS
Station

922-04697-2310-089
Report Number

GRAND THEFT
Classification of Incident

11/26/22
Date

MONTANA
Deputy's Name

ALEX VILLANUEVA, SHERIFF
Los Angeles County Sheriff's Department

25 *Exhibit 4*

26 Photo of Sheriff deputy's incident pamphlet, "Grand Theft," November 26, 2022.

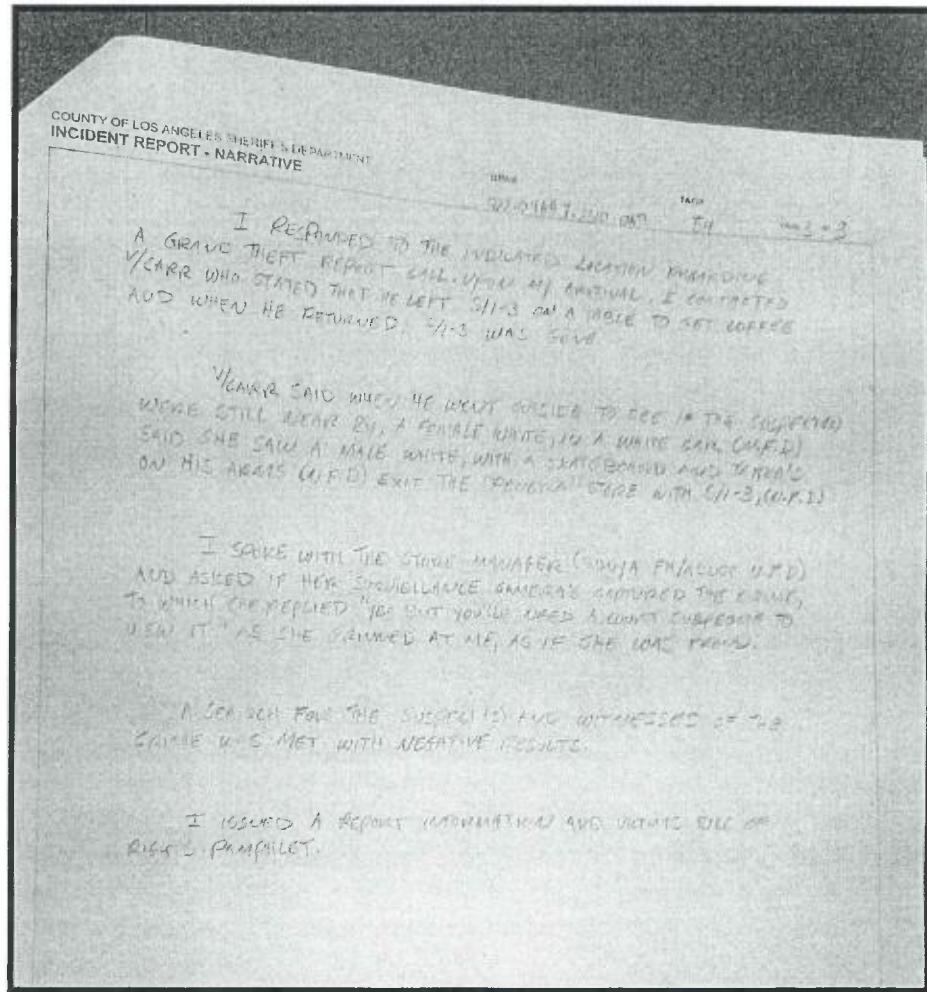


Exhibit 5

Photo of deputy's Incident Report Narrative (see third paragraph).

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Exhibit 6

Photo of email spoofed by the FBI, dated December 14, 2022, supposedly from Dr. Don K. Nakayama, complete with bogus photograph.



14 An enlarged photo of Dr. Don K. Nakayama from spoofed email.



25 *Exhibit 8*

26 An authentic photo of Dr. Don K. Nakayama.

27
28



Exhibit 7

An enlarged photo of Dr. Don K. Nakayama from spoofed email.



Exhibit 8

An authentic photo of Dr. Don K. Nakayama.

1
2
3 Men Solid Red Star Army Cool Flat Top Caps
4 China Communist Party Men International
5 Brigades Army

6
7 CLIMATE[®]



21 *Exhibit 9*

22 Chinese Communist Party military hat. It has the same red star as the hat in the
23 fake photo of Dr. Don K. Nakayama from spoofed email.
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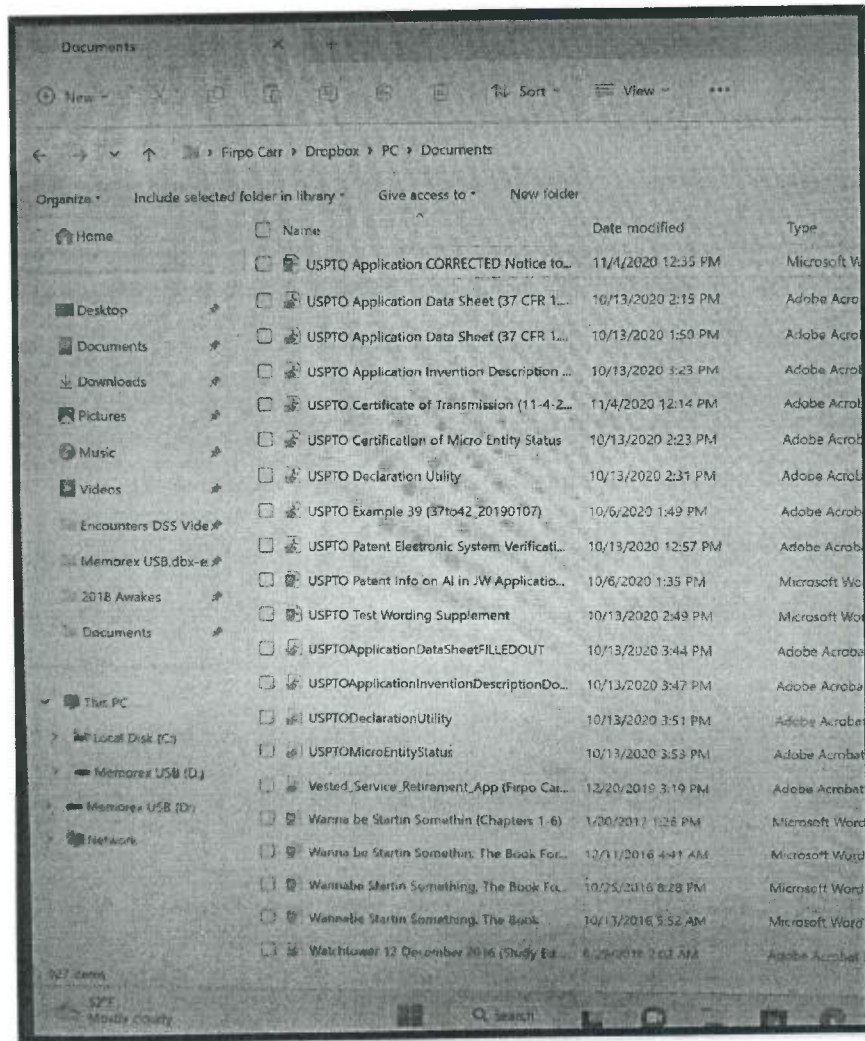


Exhibit 10

Cell phone photo of corrupted files retrieved by Plaintiff,
which have since been removed from Plaintiff's Dropbox
cloud computer storage by the FBI's Cyber Ops Unit.

EXHIBIT 11

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54°F Cloudy 9:24 PM 12/15/2022

Exhibit 11

Screenshot acknowledgement of Plaintiff's filed complaint with the DOJ
Office of Professional Responsibility, December 18, 2023.

EXHIBIT 12

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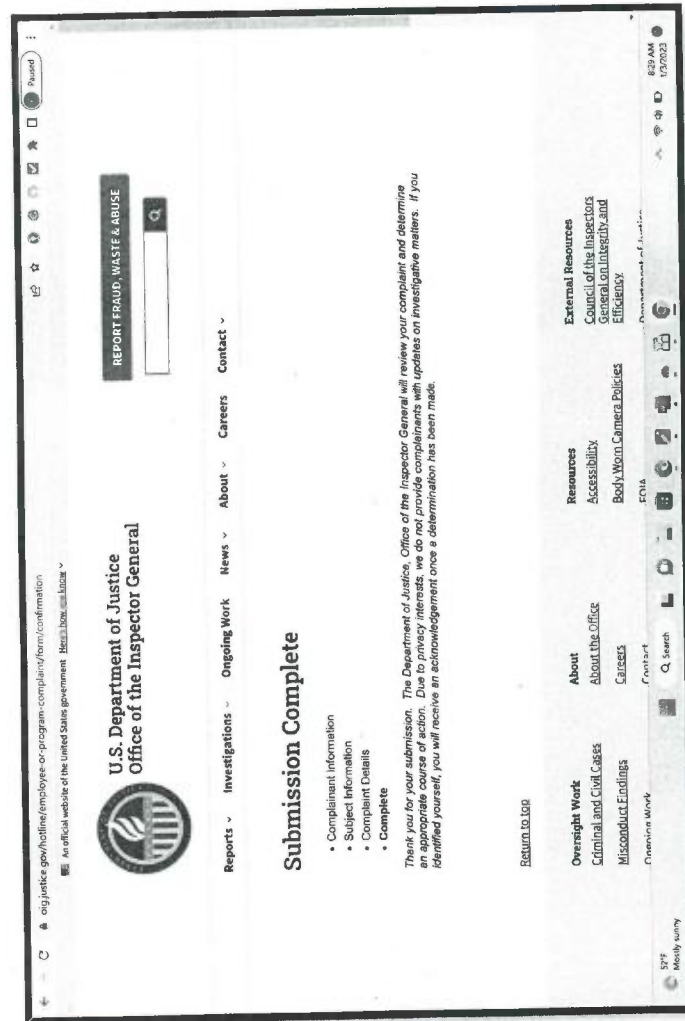


Exhibit 12

Screenshot acknowledgement that Plaintiff filed complaint with the
DOJ OIG Investigative Division, January 3, 2023.

EXHIBIT 13

Exhibit 13

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EXHIBIT 14



Exhibit 14: Vehicle and license plate of FBI Stalking Suspect #1.



Exhibit 15: Vehicle and license plate of FBI Stalking Suspect #2.

BLUEBIRDonline.com (888) 477-0700
16

EXHIBIT 15



Exhibit 14: Vehicle and license plate of FBI Stalking Suspect #1.



Exhibit 15: Vehicle and license plate of FBI Stalking Suspect #2.

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EXHIBIT 16

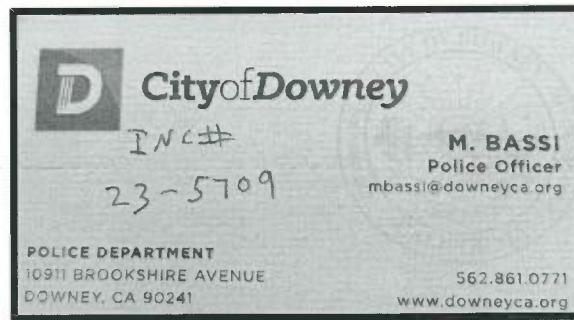


Exhibit 16



Exhibit 17

Red Mustang (8VKP441) dark rear windshield.



Exhibit 18

Red Mustang (8VKP441) illegally tinted front windshield.

 BLUEBIRDonline.com (866) 477-0700  100%

EXHIBIT 17

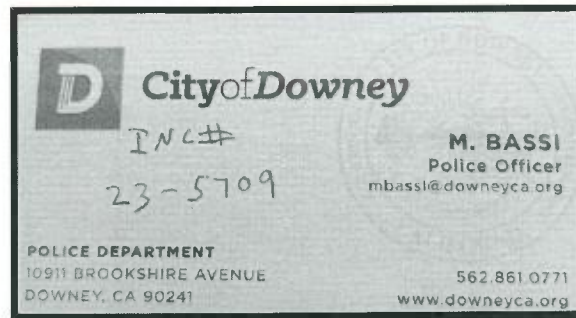


Exhibit 16



Exhibit 17

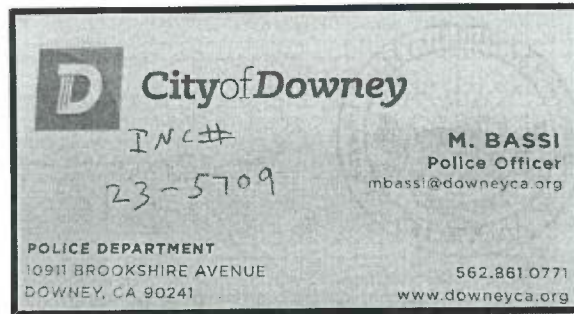
Red Mustang (8VKP441) dark rear windshield.



Exhibit 18

Red Mustang (8VKP441) illegally tinted front windshield.

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Exhibit 16



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Exhibit 17

Red Mustang (8VVKP441) dark rear windshield.



Exhibit 18

Red Mustang (8VVKP441) illegally tinted front windshield.

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100%

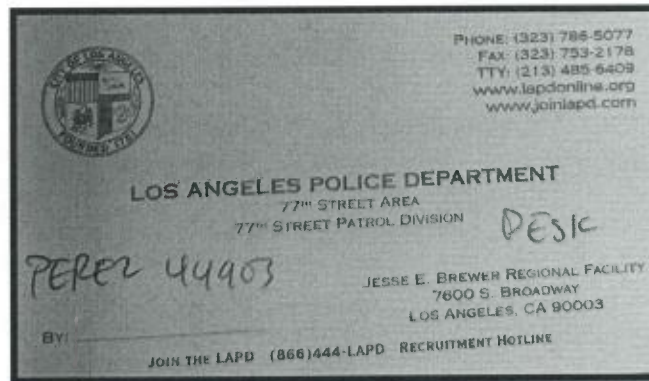


Exhibit 19

LAPD Desk, Officer Perez Serial # 44903 (card front), February 10, 2023.

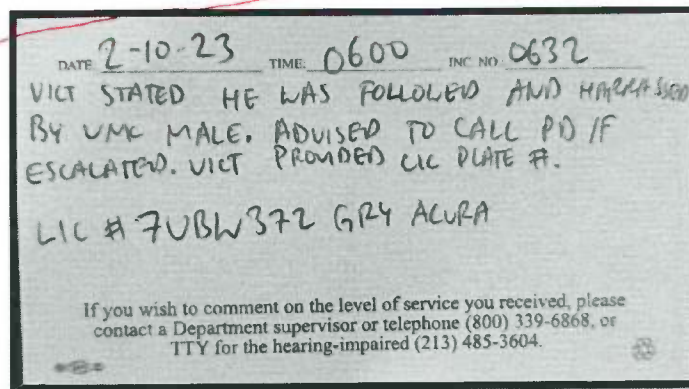


Exhibit 20

LAPD Desk, Officer Perez Serial # 44903
(card back), February 10, 2023.

 BLUEBIRDonline.com (888) 477-0700 16FT

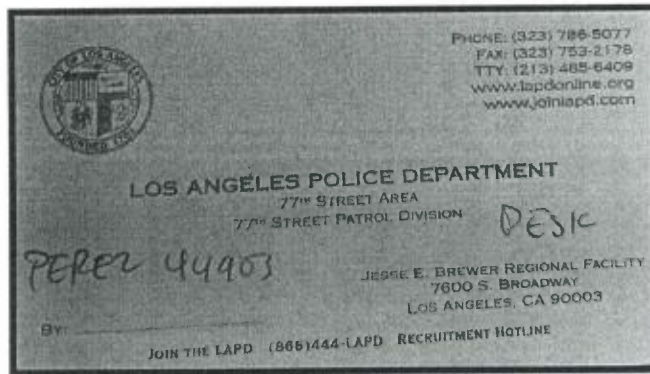


Exhibit 19

LAPD Desk, Officer Perez Serial # 44903 (card front), February 10, 2023.

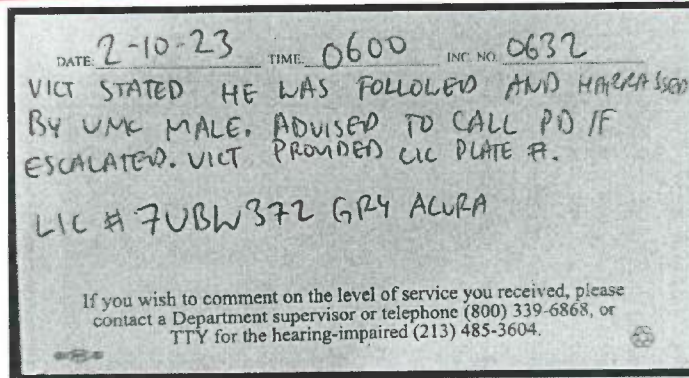


Exhibit 20

LAPD Desk, Officer Perez Serial # 44903
(card back), February 10, 2023.

EXHIBIT 21

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Exhibit 21

Vehicle with illegally tented front windshield associated
with the LAPD report in Exhibits 18 and 19, February 10, 2023

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EXHIBIT 22

STATE OF CALIFORNIA
NARRATIVE/SUPPLEMENTAL
CHP 560 (REV. 3-10) OPI 060

Page: 1 of 1

DATE OF INCIDENT/COURTESY: FEB 10, 2023 TIME (LAMP): 05:00

REPORT TYPE: ☒ Narrative ☐ Crash Report ☐ Other: ☐ BA Update ☐ Hazardous Materials ☐ Fetal ☐ School Bus ☒ Hit and Run Update ☐ Other

CITY/COUNTY/LOCAL DISTRICT: LOS ANGELES COUNTY

LOCATION/ROAD/BLVD: 105, 110, 405, 605

STATE HIGHWAY RELATED: ☒ Yes ☐ No

REPORTING DISTRICT/CITY: LOCATION NUMBER:

1. X AN UNKNOWN PERSON WITH A TINTED FRONT WINDSHIELD
2. FOLLOWED ME ONTO THE 105 FROM WESTBOUND, DRIVING
3. AGGRESSIVELY AS THEY DID SINCE THE FRONT WINDSHIELD
4. WAS TINTED, I COULD NOT DETERMINE THE RACE OR SEX
5. OF THE PERSON. SEVERAL CARS CARS WITH TINTED FRONT
6. WINDSHIELDS HAVE BEEN FOLLOWING ME AND HANGING-
7. JUNG ME ON DRIVING AGGRESSIVELY AND WHEN THE MAKE
8. A U-TURN, OR WHEN I STOP AT THE STORE AND RE-
9. TURN TO MY CAR, THE CARS WILL HAVE THEIR
10. HIGH-BEAMS ON, SEEMLY IN AN ATTEMPT TO BLIND
11. ME TEMPORARILY. THE VEHICLE PURSUING ME AROUND
12. THE DATE AND TIME ABOVE DID SO UNTIL I MANAGED
13. TO MAKE AN UNEXPECTED ILLEGAL U-TURN TO LOSE
14. THEM. FORTUNATELY, IT WORKED. STILL, THIS MOST
15. RECENT INCIDENT LEFT ME FEELING UNEASY. TO FINISH
16. THE SCENARIO, I EXITED THE 105 WB AT CENTRAL
17. AVE. AND EVENTUALLY WOUND UP AT LAPD SE DIV
18. AROUND 1030 PM. REGRETABLY, IT WAS CLOSED.
19. EVENTUALLY, I MADE MY WAY TO THE 105 EB, TO THE
20. 110 SB, WHEN I NOTICED THEY WERE ON MY TAIL
21. AGAIN. I WENT TO THE 91 EB TO 605 NB, AND EXITED
22. ALONDRA BLVD. TO A WELL LIT AREA (HOME DEPOT/
23. LA FITNESS) AT WHICH TIME THEY PULL INTO ONE OF
24. THE PARKING SPACES AWAY FROM ME. AFTER AWHILE
25. (90 MIN, APPROX), I WENT TO THE CELLTOS COLLEGE
26. PARKING LOT. FORTUNATELY, THEY DID NOT FOLLOW ME
27. AFTER GATHERING MYSELF, I WENT ONLINE TO LOCATE
28. THE NEAREST CHP BRANCH. AT ONE POINT, WHILE THEY
29. WERE PARKED, I PHOTOGRAPHED THE VEHICLE, ALBERT
30. ON ANOTHER RECENT OCCASION IT IS A CIVIC CAMARO,
31. CAP 9AGR984, BLACK IN COLOR.

PREPARED BY: NAME: DATE: REPORTER'S NAME: DATE:

Exhibit 22

CHP Report, February 10, 2023.

BLUEBIRDonline.com (858) 477-0700  

EXHIBIT 23



Exhibit 23

Vehicle with illegally tented front windshield, plate 9AGR984, associated
with the CHP Report in Exhibit 21, February 10, 2023.

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EXHIBIT 24



Exhibit 24

Stalker who exhibits the behavior of an undercover FBI agent who has been following Plaintiff for at least two years. (February 14, 2023, 6:59 am)

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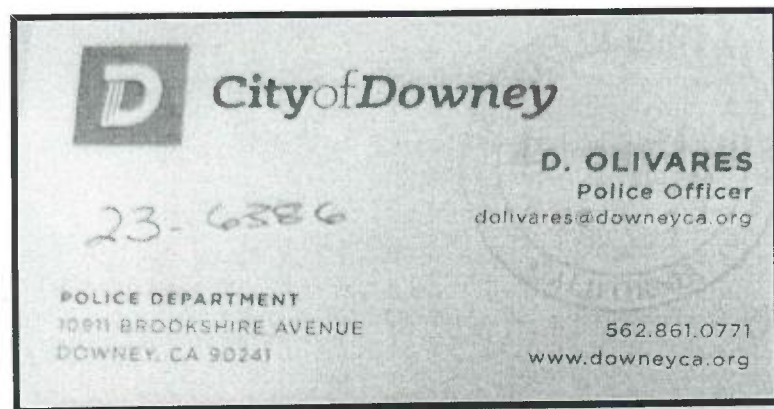


Exhibit 25

February 14, 2023.

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Incident Report

Print Date/Time: 02/14/2023 16:53
 Login ID: xvidrio

Downey Police Department
 ORI Number: CA0192000

Incident: 2023-0006396

Incident Date/Time: 2/14/2023 4:40:49 PM
 Location: 9001 APOLLO WAY
 Downey CA

Incident Type: Station Report
 Venue: Downey

Phone Number:
 Report Required: No
 Prior Hazards: No
 LE Case Number:

Source: Telephone
 Priority: Low
 Status: Report
 Nature of Call:

Unit/Personnel

Unit		Personnel					
No.	Role	Name	Address	Phone	Race	Sex	DOB

Vehicle(s)

Role	Type	Year	Make	Model	Color	License	State
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Disposition(s)

Disposition	Count
Incident Number Issued: 1	

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
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Page 1 of 2

CONFIDENTIAL
 Released to: E. CARP
 By: XV Date: 02/14/23

Exhibit 26

Downey police Incident Report associated
 with Exhibit 25, February 14, 2023.

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EXHIBIT 27

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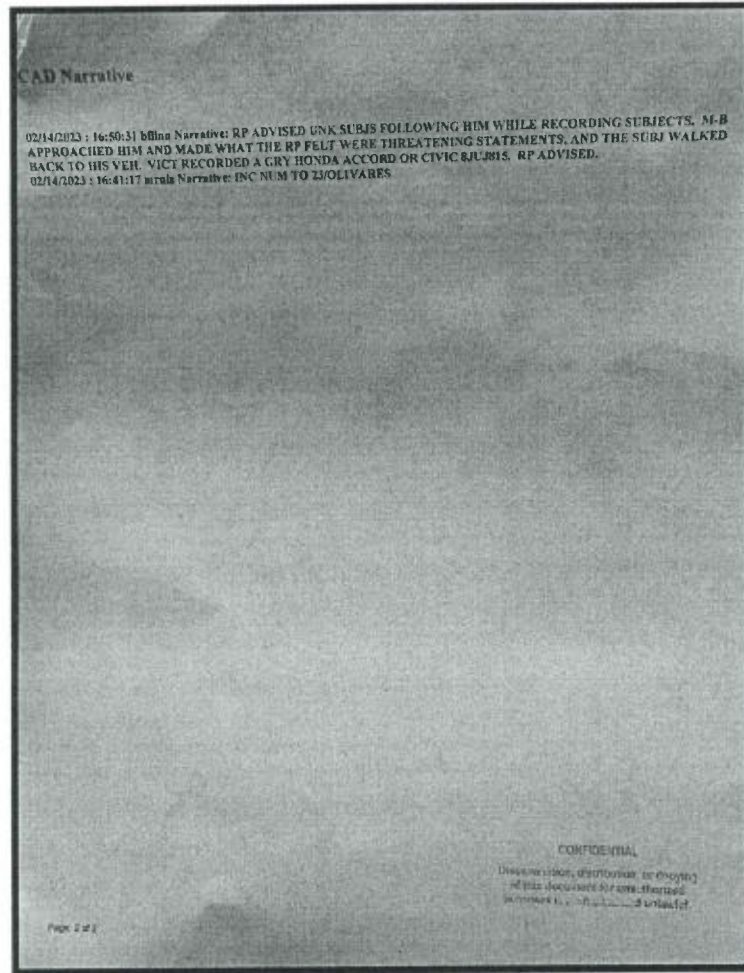


Exhibit 27

Downey police Incident Report Narrative associated
with Exhibits 25 and 26, February 14, 2023.

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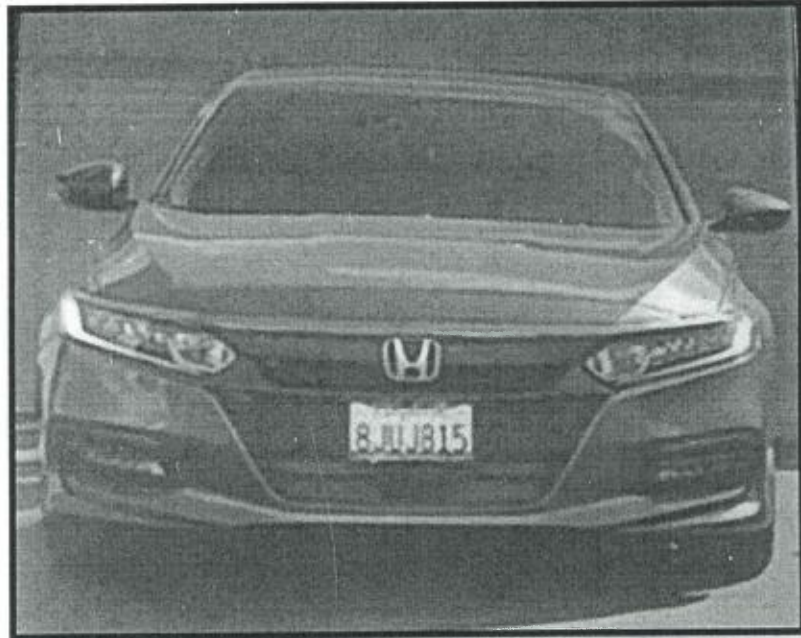


Exhibit 28

Stalker's car (plate # 8JUH815) who threatened Plaintiff associated
with Exhibits 25, 26, and 27, February 14, 2023.

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Exhibit 29

Stalker partner's car (plate # 8LYU154) associated
with Exhibits 25, 26, 27, and 28 February 14e, 2023.

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**Report Information
and
Victims' Bill of Rights**

LAKEWOOD
Station

LKD23049-0290
Report Number

DISTURBANCE
Classification of Incident

02/18/23
Date

HECKING 657314
Deputy's Name

ALEX VILLANUEVA, SHERIFF
Los Angeles County Sheriff's Department

Training Officer Milton



AMOS N. WILSON

College Edition

Exhibit 30

LASD Lakewood pamphlet (February 18, 2023).

EXHIBIT 31

 BLUEBIRDonline.com (866) 477-0700  48PT

Message print requested by terminal:LKDS 02/19/23 17:08:54 P01

INCIDENT RECORD 02/19/23 1707

LKD23049-0280 10/98
 UNITS: 133E/P 133/P 133B/P 133D/P 133T1/P
 PRIORITY: P RADIO CODES: P245
 LOCATION: 14822 LAKEWOOD BL,BLF "BLF SELF STORAGE"
 VEHICLE: 8GLC583/CA
 INF: FIRPO CARR. 513 764 6224
 REMARKS:GEO:VEH ATTEMPTED TO RUN OVRINF INSIDE STORAGE FACILITY.
 GRV SEDAN 8GLC583 L/S N/B LAKEWOOD BL.
 CLEAR: 777/940 RD: 1332
 C/CARR,FIRPO MB/091754 NO EV OF 245, VEH TURNED TO AVOID HIM
 . INF STORY CHANGED, BELIEVES MULT CARS TRYING TO HIT HIM LATELY
 , POSS 918

/2027 CALL LKD05

133/P:	/2031 DSPS	/2031 ENR	/2034 ENR	/2034 10/97	/2111 10/98
	/2031 ACKOV				
133B/P:	/2031 DSPS	/2036 NOACK	/2036 DSP	/2039 10/97	/2105 10/98
	/2038 ACKOV	/2038 ENROV			
133D/P:	/2033 DSPS	/2033 ACK	/2033 ENR	/2042 10/97	/2044 10/98
133E/P:	/2031 DSP	/2031 ENR	/2036 10/97	/2059 10/98	
	/2031 ACKOV				
133T1/P:	/2031 DSP	/2031 ACK	/2031 ENR	/2032 10/97	/2051 10/98

Exhibit 31

Gray sedan with plate # 8GLC583 that left site headed northbound on
 Lakewood Blvd. as documented here dated February 19, 2023.

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EXHIBIT 32



Exhibit 32

High performance car with illegally tinted front windshield.

 BLUEBIRDonline.com (888) 477-0700 NSF

EXHIBIT 33



Exhibit 33

Vehicle in upper right corner of photo with extremely
high passenger side front headlight.

EXHIBIT 34



Exhibit 34

One of numerous FBI vehicles with extremely high
headlights that follow Plaintiff wherever he goes.